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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Kathleen Bliss, on behalf of herself, the Proposed
Nationwide Rule 23 Class, and the Proposed
Nevada Subclass,

Plaintiff,

v.

CoreCivic, Inc.,

Defendant.

NO. 2:18-cv-01280-JAD-EJY

**STIPULATION TO EXTEND
DEADLINES
(Fifth Request)**

Defendant, CoreCivic, Inc. (“CoreCivic”), and Plaintiff, Kathleen Bliss (“Plaintiff”), respectfully request a one-week extension of the deadlines for CoreCivic’s class certification expert disclosure, the completion of class certification expert discovery, and the opening and response

1 class certification briefs.¹ This is the parties' fifth request to extend these deadlines, but the fourth
 2 following remand from the Ninth Circuit. (*See* Dkt. 86, 155, 216, and 222.)

3 As demonstrated in the parties' prior stipulations and other filings, the parties have been
 4 diligently engaged in discovery since the case was remanded, including, as relevant here,
 5 production of extensive inmate/detainee call data by third-party inmate/detainee telephone service
 6 providers; Rule 30(b)(6) depositions of several third-party inmate/detainee telephone service
 7 providers; and a Rule 30(b)(6) deposition of CoreCivic.

8 **Representations by CoreCivic:** CoreCivic's expert has been working diligently to review
 9 and analyze the call data and prepare his expert opinions. In broad terms, this has included
 10 normalizing telephone numbers (including attorney numbers that appear to have come from OCR'd
 11 paper directories and websites listing bar members), normalizing call data to permit matching of
 12 the call detail records against attorney numbers, identify recorded and non-recorded calls, matching
 13 facility names, and comparing call data across a large and disparate set of data from many facilities
 14 and many telephone services platforms over more than six years. CoreCivic's expert is working to
 15 compile this data into two primary tables—one consisting of unique calls across all facilities for
 16 the relevant time period, and one consisting of all attorney phone numbers called across all facilities
 17 for the relevant time period—but this has unfortunately taken longer than anticipated.

18 CoreCivic's expert has thus far identified approximately 80,000,000 unique calls and
 19 1,000,000 unique attorney telephone numbers. He has nearly completed his review and analysis of
 20 the data and expects to be able to complete his report for disclosure by Friday, April 28, 2023.

21 Plaintiff is without knowledge as to the work CoreCivic's expert has performed, but is
 22 agreeable to the extension. As noted above, the parties are not seeking to extend the deadline for
 23 the class certification reply brief. As a result, the requested extension will not affect the timeline
 24 for resolution of the class certification motion or the deadlines that are keyed off of that resolution.

25 The following deadlines are currently in effect:

- 26 • Defendant's Class Certification Expert Disclosure: 4/21/23

27
 28 ¹ The parties do not seek to extend the deadline for the class certification reply brief.

- Completion of Class Certification Expert Discovery: 5/12/23
- Plaintiff's Opening Class Certification Brief: 6/2/23
- Defendant's Class Certification Response Brief: 7/14/23
- Plaintiff's Class Certification Reply Brief: 8/14/23

The parties respectfully request that the Court extend all deadlines except the Class Certification Reply Brief deadline by one week, as follows:

- Defendant's Class Certification Expert Disclosure: **4/28/23**
- Completion of Class Certification Expert Discovery: **5/19/23**
- Plaintiff's Opening Class Certification Brief: **6/9/23**
- Defendant's Class Certification Response Brief: **7/21/23**
- Plaintiff's Class Certification Reply Brief: 8/14/23

DATED this 21st day of April, 2023.

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: April 21, 2023